

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

Gregg Lurie, Heidi Kaliher, and Tracy)	Case No. 0:23-cv-00440-KMM-DLM
Knight individually, and on behalf of)	
those similarly situated,)	
Plaintiffs,)	PLAINTIFFS' MOTION
v.)	TO POSTPONE THE
North Memorial Health Care, d/b/a North)	IDENTIFICATION OF CLASS
Memorial Health,)	CERTIFICATION EXPERT
Defendant.)	WITNESSES
)	

This matter comes before the Court on Plaintiffs' Motion to Postpone the Identification of Plaintiffs' Class Certification Expert. Pursuant to the Court's Pretrial Scheduling Order (Dkt. No. 63), on or before May 1, 2025, Plaintiffs shall identify their class certification experts under Fed. R. Civ. P. 26(a)(2)(A). Plaintiffs seek relief from this deadline and request the Court postpone the deadline pending the May 16, 2025 Status Conference.

The parties have met and conferred regarding the current case schedule and agree that modification of the Pretrial Scheduling Order (Dkt. No. 63) is appropriate, however, the parties were unable to meet and confer on this specific modification prior to the deadline. Plaintiffs will file a Meet-and-Confer Statement pursuant to Local Rule 7.1(a)(1)(A). Under the current schedule, fact discovery closes on or before June 1, 2025, and Plaintiffs must file their motion for class certification on or before July 1, 2025. Plaintiffs and North Memorial intend to seek relief from the current schedule because

additional time is required to complete fact discovery and prepare for Plaintiffs' forthcoming motion for class certification and are preparing a proposal to that effect. This forthcoming proposal will provide additional support for modification of the case schedule and will be the first request to modify the schedule in this case.

The Court has scheduled a Status Conference for this case on May 16, 2025, at which time Plaintiffs will be prepared to discuss the case schedule with the Court. Plaintiffs request the Court postpone the deadline to identify their class certification experts pending the parties' forthcoming proposal concerning the case schedule and the May 16, 2025 Status Conference.

Respectfully submitted,

Dated: May 1, 2025

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